

## Authorization Basis Amendment Request

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ABAR Title: Alignment of ISMP and SRD with QAPIP Rev. 5 and Selection of Quality Assurance Implementing Standard

ABAR #: ABAR-W375-00-00010 Revision: 0 Associated ABCN #: ABCN-W375-00-00006, ABCN-W375-00-00010, and ABCN-W375-00-00015

Originator: Thomas R. McDonnell Date: 16 Mar 2000  
Print Name

Description of proposed revision:

1. Revise appropriate sections of the current *Integrated Safety Management Plan* (ISMP) and *Safety Requirements Document* (SRD) to make them consistent with Revision 5 of the QAPIP. Revise revision-specific QAPIP references in the SRD and ISMP from Rev. 4 to Rev. 5, or delete the revision-specific reference.

In letter #00-RU-0163, the Regulatory Unit approved Revision 4C of the QAPIP, subject to two conditions, one of which was: "BNFL shall modify the TWRS-P Project Integrated Safety Management Plan (BNFL-5193-ISP-01, Revision 4) as necessary to reflect the changes to the QAPIP." (The RU also noted that, with its approval, BNFL will issue Revision 4C of the QAPIP, as modified to respond to RU comments, as Revision 5.)

Because much of the current ISMP discussion of Quality Assurance duplicates that contained in the QAPIP, this revision also removes such redundant material from the ISMP, replacing it, as necessary, with cross-references to the QAPIP. Similarly, where the ISMP cites portions of the ISAR for details of specific QA requirements that are essentially redundant to the QAP, such citations have been deleted.

In addition, several changes to the Acronyms section of the ISMP are included in this revision. One such change merely corrects a typographical error for the acronym "QAPIP;" in so doing, the acronym is relocated in the alphabetized list. The other changes delete acronyms that are not used anywhere within the body of the ISMP and so are superfluous.

2. Replace the citations to various ISMP sections as implementing standards for SRD Safety Criteria 7.3-1 through 7.3-11 with the applicable sections of DOE G-830.120-REV. 0, Implementation Guide for use with 10 CFR Part 830.120, Quality Assurance, April 15, 1994, as tailored for RPP-WTP.

Deletes the citation to ISMP section 3.3.3 as the implementing standard for SRD Safety Criterion 7.3-12.

3. This revision involves the modification of several ISMP sections that are identified as implementing standards in the SRD Safety Criteria. The modified ISMP sections and corresponding SRD Safety Criteria are listed in Attachment #1 to this ABAR.

In addition, SRD Vol. II, Appendix B, Implementing Standard for Defense in Depth, is being revised to replace the specific reference to QAPIP Rev. 4 with a general reference to the QAPIP. (This is actually an editorial change that is being made to avoid the need to revise revision-specific references in one AB document to another.)

4. Included with this change are corrections of two minor editorial oversights in ISMP Rev. 4b, which resulted from converting the ISMP file from WordPerfect® to Microsoft® Word. No actual text changes are being made. Specifically, the two corrections are as follows:

- ISMP page 3-8 is being reprinted in the same font as the rest of the document. This font change results in eliminating the need for page 3-8a.
- ISMP pages 3-18 and 3-18a are reprinted to correct page break discrepancies that occurred in Rev. 4b. This change reinserts two lines of text at the top of page 3-18 that were inadvertently dropped off due to the WordPerfect to Word conversion in Rev. 4b. The last paragraph of Rev. 4b page 3-18a has been deleted, because the same paragraph was duplicated on page 3-19.

Reason(s) for the proposed revision:

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ABAR #:	<u>ABAR-W375-00-00010</u>	Revision:	<u>0</u>	Associated ABCN #:	<u>ABCN-W375-00-00006, ABCN-W375-00-00010, and ABCN-W375-00-00015</u>
Originator:	<u>Thomas R. McDonnell</u>	Date:	<u>16 Mar 2000</u>		
	Print Name				

**Reason(s) for the proposed revision:**

This ABAR represents a corrective action in response to the RU finding IR-99-007-03-FIN b, which states:

“Procedure K70C528A\_1, Section 5.0, ‘Authorization Basis Change Notice (ABCN),’ requires the generation of an ABCN if a proposed change affects the authorization basis.

“Contrary to the above, during preparation of revision 5 of the QAPIP, screening assessment SCA-W375-99-00123, revision 0, dated August 5, 1999, for determining the affect the revision would have on the authorization basis, identified that the change would affect the Standards Requirements Document (SRD) and the ISMP; however, as of November 23, 1999, no ABCN had been generated to document the changes to the SRD and ISMP.”

ABCN-W375-00-00010, Rev. 0, and ABCN-W375-00-00006, Rev. 0, which are associated with this ABAR, were generated to document the changes to the SRD and ISMP, respectively. These ABCNs projected preparation of Safety Evaluations and an ABAR by 17 March 2000. This ABAR closes out the procedural discrepancy identified in IR-99-007-03-FIN b.

As noted above, RU approval of the revised QAPIP is contingent upon BNFL making the corresponding changes to the ISMP.

Much of the current ISMP discussion of Quality Assurance duplicates that contained in the QAPIP. Because both the ISMP and the QAPIP have equal regulatory status as Authorization Basis (AB) documents, this duplication is unnecessary. Similarly, citations in the ISMP cites portions of the ISAR for discussions of QA program requirements are redundant. Furthermore, providing equivalent discussions in different AB documents, which are under the control of different project departments, means that a change to one document requires a corresponding change to the other, as this current ABAR demonstrates. Not only is the effort to produce and justify such changes increased by redundancy, but it increases the potential for errors in the AB. Therefore, this revision provides both efficiency and regulatory certainty.

Issuance of QAP Rev. 5 is contingent upon BNFL Inc.’s revising the corresponding portions of the SRD and ISMP, such that all three Authorization Basis documents will be consistent. In conjunction with that effort, portions of the ISMP that are redundant to the QAPIP are being edited to eliminate the redundancy. In so doing, several ISMP sections that are cited as implementing standards to safety criteria in SRD Safety Criteria 7.3-1 through 7.3-12 are being changed. In some cases, these changes invalidate the selection of the respective ISMP section as an implementing standard. Therefore, a new implementing standard for quality assurance is needed.

**Description of the proposed implementation schedule:**

The ABAR will be incorporated within 30 days of receipt of RU approval.

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If the revision involves the deletion or modification of a standard previously identified in the approved SRD, provide:

- A. An evaluation that demonstrates the revised SRD continues to identify a set of standards that will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards; and
- B. A certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

## Attachments:

- 1. Copies of the AB document(s) or appropriate excerpt showing the proposed revision(s).
- 2. Copy of safety evaluation.
- 3. If not included above, justification for the revision and demonstration that the revision is safe.
- 4. Items A and B above, if applicable.

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Manager, Engineering

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Date

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Radiation Safety and Regulatory Manager

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Date

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Manager, Quality Assurance

\_\_\_\_\_  
Date

\_\_\_\_\_  
Chairman, Project Safety Committee

\_\_\_\_\_  
Date

\_\_\_\_\_  
RPP-WTP General Manager

\_\_\_\_\_  
Date